



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

April 9, 2009

Tim Smith
Bakersfield Field Manager
Carrizo Plain National Monument RMP
Bureau of Land Management
Bakersfield Field Office
3801 Pegasus Drive
Bakersfield, CA 93308

Subject: Carrizo Plain National Monument Draft Resource Management Plan and Draft
Environmental Impact Statement, San Luis Obispo and Kern Counties,
California [CEQ #20090007]

Dear Mr. Smith:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Carrizo Plain National Monument Draft Resource Management Plan and Draft Environmental Impact Statement (DRMP/DEIS) assesses alternatives for the management of 246,852 acres of land in the Carrizo Plain National Monument (CPNM). Approximately 206,500 acres are administered by the Bureau of Land Management (BLM); 8,702 acres are administered by the California Department of Fish and Game; 607 acres are administered by other state agencies; 75 acres are administered by the Nature Conservancy; and approximately 31,000 acres are privately owned. The DRMP/DEIS does not apply to privately owned lands or interests within the CPNM.

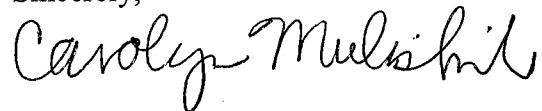
The DRMP/DEIS presents four management alternatives. The *No Action Alternative* retains current management policies and plans. Alternative 1 represents a more limited approach to resource management and provides for more limited public use of the Monument. Alternative 2 (*Preferred Alternative*) represents an approach that incorporates elements of other alternatives and provides a balance between protection and restoration while allowing for compatible public use. Alternative 3 represents the most active approach to management and provides for a broader array of public use and access.

The DRMP/DEIS is well organized and provides useful and detailed information regarding natural resources in the CPNM. We commend the BLM for preparing a well-written, comprehensive document and for proactively including topics such as climate change. We note that the *Preferred Alternative* recommends a transition to grazing for vegetation management purposes only, upon voluntary relinquishment of Section 15 grazing rights. Results of the Carrizo grazing study, however, indicate that grazing is not necessarily an effective tool for reducing the dominance of nonnative species and can, in fact, have detrimental effects on native annual plants and some animal species. We are concerned about the potential impacts associated with long-term grazing in the CPNM.

Based on our review of the document, we have rated the DRMP/DEIS as Lack of Objections (LO) (see enclosed "*Summary of Rating Definitions*"). However, we have concerns regarding the impacts of grazing on native annual plants and we encourage the BLM to closely monitor grazing activities and implement adaptive management strategies where necessary. Where harmful impacts from grazing occur, we would encourage BLM to consider suspending, reducing, or eliminating livestock grazing to the extent possible. EPA's recommendations are further discussed in our Detailed Comments (attached).

We appreciate the opportunity to review this DRMP/DEIS and request a copy of the Final Resource Management Plan and Final Environmental Impact Statement (FRMP/FEIS) when it is officially filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3521, or have your staff contact Ann McPherson at (415) 972-3545 or mcpherson.ann@epa.gov.

Sincerely,



Carolyn Mulvihill for
Kathleen M. Goforth, Manager
Environmental Review Office

Enclosures: Summary of Rating Definitions
EPA Detailed Comments

SUMMARY OF EPA RATING DEFINITIONS¹

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACTS OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impact that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

¹ From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

**USEPA DETAILED COMMENTS ON THE CARRIZO PLAIN NATIONAL MONUMENT DRAFT
RESOURCE MANAGEMENT PLAN AND DRAFT ENVIRONMENTAL IMPACT STATEMENT,
SAN LUIS OBISPO AND KERN COUNTIES, CALIFORNIA, APRIL 9, 2009**

Livestock Grazing Impacts

Grazing can significantly affect the functioning condition of riparian areas by increasing erosion, compaction, sedimentation, and runoff rates. Arid regions of the Southwest are particularly fragile and susceptible to damage from livestock grazing. Livestock can have a dramatic impact on riparian areas in fragile arid lands by trampling down stream banks, snapping tree seedlings, and denuding the vegetation. Currently, 170,100 acres are designated as available for livestock grazing within the Carrizo Plain National Monument (CPNM) and 36,400 acres are designated as unavailable (pg. 3-78). Approximately 55,900 acres are authorized under Section 15 livestock grazing leases and approximately 114,200 acres are authorized under free use grazing permits.

The Draft Resource Management Plan and Draft Environmental Impact Statement (DRMP/DEIS) states that livestock grazing during the green season has been employed under the assumption that it was “an effective tool to remove standing biomass, reduce the dominance of nonnative species, and enhance the reestablishment of native species” (pg. 3-34). Results of the Carrizo grazing study (1997 – 2003) indicate that grazing is not necessarily an effective tool for reducing the dominance of nonnative species and can, in fact, have detrimental effects on native annual plants and some animal species, such as the giant kangaroo rat. The DRMP/DEIS states that use of the Conservation Target Table, monitoring studies, and other adaptive management tools are expected to minimize negative impacts to vegetation. Given the uncertainty of how Carrizo Plain grasslands might respond to long-term livestock grazing, however, successful management requires thoughtful implementation and thorough monitoring of any grazing activities.

Recommendation:

Considering that the results of the monitoring study do not support the general hypothesis that livestock grazing is beneficial for native plant communities, EPA recommends that BLM consider further actions to reduce grazing to the extent possible.

EPA recommends that the Final Resource Management Plan and Final Environmental Impact Statement (FRMP/FEIS) include additional information on adaptive management strategies and tools that may be implemented in conjunction with grazing activities.

The DRMP/DEIS states that all grazing allotments will be assessed to determine if they are meeting the standards for Rangeland health and grazing authorizations will be adjusted as necessary (pg. 2-172). The DRMP/DEIS also states that Rangeland health assessments have been completed on all the allotments authorized by Section 15 leases, except the Chimineas Ranch South allotment (since it is currently vacant) (pg. 3-79).

Recommendations:

EPA recommends that the FRMP/FEIS discuss the results of the Rangeland health assessments and describe the criteria used to determine if the areas are properly functioning.

The FRMP/FEIS should display the percentage of actual grazing use that has occurred during the past five years for each allotment.

Should any allotments be classified as impaired, EPA recommends that BLM give further consideration to suspending grazing use until Rangeland health is restored.

The *Preferred Alternative* recommends a transition to grazing for vegetation management purposes only. The DRMP/DEIS states that the *Preferred Alternative* includes a process that provides for phasing out Section 15 grazing leases upon voluntary relinquishment of grazing rights. The BLM will re-evaluate the permitted grazing in terms of land use plan goals and, based on this analysis, re-allocate all or part of the relinquished permitted use as either “available for livestock grazing but only for the purpose of vegetation management” or “unavailable for any livestock grazing” (pg. 2-172). The DRMP/DEIS, however, does not elaborate on the review process or present a mechanism for dealing with Section 15 leases that are not voluntarily relinquished, of importance particularly if negative impacts are documented.

Recommendation:

The FRMP/FEIS should consider other mechanisms to reduce or eliminate livestock grazing in those areas where adverse impacts occur, either through administrative action pursuant to current management authority or by buying out grazing interests and retiring the associated grazing allotments.

Biological Monitoring and Adaptive Management Plan

Surface disturbance and disruptive activities, such as vehicular use and grazing, can cause loss of habitat, habitat fragmentation, and wildlife displacement. In order to evaluate the impacts on threatened and endangered species, baseline conditions must be determined initially.

Recommendation:

EPA recommends that BLM establish a monitoring and adaptive management plan for threatened and endangered species. Baseline conditions should be determined initially, and a monitoring and adaptive management plan should be established to evaluate and respond to the impacts on resources in the CPNM. A description of the monitoring and adaptive management plan, and funding necessary to implement this plan, should be included in the FRMP/FEIS.